

IN THE UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF TEXAS

FEB 22 2019

BEAUMONT DIVISION

BY  
DEPUTY \_\_\_\_\_

NO. 1:17CR153(8)

THE UNITED STATES

IN THE 153RD COURT

v.

ALEXANDER ALONSO-MASCORRO

JEFFERSON COUNTY TEXAS

MOTION TO DISMISS PRO SE

TO THE HONORABLE JUDGE OF SAID COURT:

NOW COMES, Defendant Alexander Alonso-Mascorro by and through prose, and respectfully moves this court, under the principles of *Howard v. U.S. Bureau of Prisons*, 487 F.3d 808, 813-14 (10th Cir. 2007), *Franks v. Delaware*, 438 U.S. 154 (1978), *Wong Sun v. United States*, 371 U.S. 471 (1963), G.S. 15A-978(a), and *U.S. v. Gobert*, 139 F.3d 436, 438-39 (5th Cir. 1998), with the exercise of due diligence and good faith, and in support thereof, would show the court as follows:

### Factual Summary

The first day I met Miguel Gerardo Rodriguez (MGR) an excustomer brought him and introduced (MGR) as Javier. On or about but toward the end of 2013, (MGR) came to my paint and body shop named (Alonso's Frame and body, located at 7719 1/2 Park Place Blvd. Houston, TX 77087) seeking to get repairs to the front end collision damage of his (Blue 2008 Cadillac Escalade). When (MGR) first came

to my shop, I did not know his real name. (MGR) asked me if I can accomplish the repairs his SUV needed, and if so, his insurance would cover the expenses for it, and I said, "yes, I can fix it." That same day (MGR) told me he will make the arrangements for his mother in law to call the insurance and tell them where the SUV was located to do their own estimate. I learned of (MGR's) real name on the day of my arrest, prior to that, the day I met him, he told me to call him by his nickname "Chatto." In order to complete all the necessary repairs while looking for cost effective parts it caused me to take about two to three months. Other factors that caused my delay of repairs were the supplements needed for additional funds to complete the collision damage. (MGR) would often come to my shop to stay closely updated with the progress of his SUV. (MGR) never mentioned by conversation, phone communication or any other form of communication any illegal activities, negotiations, or ideas about this case. I was not involved in any illegal activities with him and I was questioned in early 2015 and fully confirmed about the allegations against him the day of my arrest on February 20, 2018. Every conversation between (MGR) and I in 2013 were about his SUV. I have factual physical evidence of our business negotiations, contract, short relationship between (MGR) and I that I explained to Joel W. Vasquez who failed to assist and allow me to bring forward these facts to the court as shown on Exhibits B.1 / 2 pages long and Exhibits B.2 / 7 pages long. See *Howard v. U.S. Bureau of prisons*, 487 F.3d 808, 813-14 (10th Cir 2007) (Due process protections require prisoners be allowed to introduce documentary evidence in their defense)

I have evidence in support of agents falsiality, making false statements knowingly disregarding their own allegations. During the date of my bond hearing Detective Emmerson (DE) stated on the record that I sent someone to sell (an agent) 2 oz. of meth for \$1400 and in response to his allegation, my counselor Joel W Vasquez asked (DE) if the government had that person that I allegedly sent to that (agent) to sell that (agent) 2 oz. of meth for \$1400 in custody. (DE's) answer to the question was no we don't have him in custody, we don't know who that person was. This transaction was alleged to have occured on April 17, 2014. However when you reffer to Exhibit A.1 section 2.0 the factual basis paperwork that followed after my indictment paperwork, you will read that (Agents) alleged that I met with (an agent) to sell that (agent) 2 oz. of meth for \$1400 on that same date of April 17, 2014. It is self evident when the court compares Exhibit A.1 section 2.0 to the bond hearing transcript that (DE) clearly and knowingly with reckless disregard to the truth and without due diligence and in bad faith prejudicially made false statements that were a part of the probable cause against me in this case. See *Franks v. Delaware*, 438 U.S. 154 (1978) restating: If a defendant establishes by a preponderance of the evidence that an affiant made a false statment knowingly or with reckless disregard for the truth, then that false information must be set aside. If the remainder of the affidavit is insufficient to establish probable cause, then the warrant must be voided and the fruits of the search or arrest excluded from trial. See *Wong Sun v. United States*, 371 U.S. 471 (1963) (when evidence is obtained as a result of illegal police conduct, not only must that evidence be suppressed, but also all evidence that is the "fruit" of the illegal conduct.) A defendant is entitled to introduce evidence contesting the truthfulness of the evidence, See G.S. 15A-978(a) Reffer to Exhibit A.3 section 4.0 for the above alleged transaction date April 17, 2014

On Exhibit A.2 section 2.0 it states: Toll records reveal that on March 2, 2014 before and after the Kingsville, Texas, seizure, Mascorro was in phone contact with Courier 2 twelve (12) times. On that date, Mascorro was also in phone contact with Courier 3 thirty four (34) times, and on that date Mascorro was in phone contact with Rodriguez forty-nine (49) times. These phone contacts were for the purpose of arranging delivery of narcotics from the source in the Rio Grand Valley to Rodriguez in the Houston area.

(Courier 2)

Before and after the Texas Kingsville seizure, I never call (Courier 2) before or after for any purpose of arranging deliveries of narcotics from or to any place.

(Courier 3)

On March 2, 2014 regarding Courier 3 on Exhibit A.2 Section 2.0 this is a false statement because I never call any (one person) (an individual) more than five (5) times max in a full day consisting of 24 hrs.

(Rodriguez)

On March 2, 2014 regarding Rodriguez on Exhibit A.2 Section 2.0, this is a false statement because I never call any (one person) (an individual) more than five (5) times max in a full day consisting of 24 hrs. Furthermore, no calls I made to Rodriguez from me were for the purpose of arranging deliveries of narcotics from or to any place. The only reason I had for calling Rodriguez was because he was a customer of mine from (Alonso's Frame and body.)

On Exhibit A.3 section 1.0, if a alleged source notified/informed the Houston Police department of a Chevrolet Silverado with Tamaulipas plates WL49884 (To the best of my knowledge, I have not seen that truck in my life), that is not a person I'm aware of. I am not familiar with a place called Mascorro's auto shop in Houston, however I own (Alonso's Frame and body) located at 7719 1/2 Park Place Blvd. Houston, TX, 77087.

On Exhibit A.3 section 2.0, during July 10, 2014, when agents stopped Courier 4 and recovered 2.4 kilograms of cocaine HCL, agents allege that the 2.4 kilograms of cocaine was being transported to Mascorro's auto shop. I am not familiar with a place called Mascorro's auto shop, and if any narcotics were in transit to my area, I was not aware of it.

On Exhibit A.3 section 3.0, this had nothing to do with me, so this is a false accusation by agents.

On Exhibit A.3 section 4.0, this had nothing to do with me, so this is a false accusation by agents.

On Exhibit A.4 section 1.0, this had nothing to do with me, so this is a false accusation by agents.

On August 10, 2018, a co-defendant filed a motion to suppress illegally obtained wiretap evidence.

On December 4, 2018, the government objected to the suppression


On January 8, 2019, the objection was overruled by the Honorable Judge Thad Heartfield.

I defendant Alexander Alonso-Mascorro respectfully reurge this Honorable Court to dismiss violation 21 U.S.C. § 846 Conspiracy to ~~possess~~ possess with the Intent to Distribute a Controlled Substance, to prevent the likelihood of a miscarriage of justice based off the insufficient factual bases in this case, citing U.S. v. Gobert, 139 F.3d 436, 438-39 (5th Cir 1998), and Franks v. Delaware, 438 U.S. 154 (1978)

### CONCLUSION

WHEREFORE, PREMISES CONSIDERED, the defendant respectfully requests that the Honorable Court move for dismissal pursuant to the supporting facts and caselaw herein.

Respectfully submitted

By: Alexander Alonso Mascorro 

CERTIFICATE OF SERVICE

I certify a true copy of the above motion to dismiss was served upon the Government, hand delivered or mailed, postage, prepaid to the Crim DA and District Clerk of Jefferson County, Texas, on the day of 2-19-2019.



IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
BEAUMONT DIVISION

UNITED STATES OF AMERICA	§
	§ 1:17CR153(8)
v.	§ Judge Thad Heartfield
	§
ALEXANDER ALONSO	§
MASCARRO (8)	§

**FACTUAL BASIS AND STIPULATION**

The United States of America, presents to the Court, by and through the undersigned Assistant United States Attorney in and for the Eastern District of Texas, joined by the defendant, **Alexander Alonso Mascarro** and the defendant's attorney **Joel W. Vazquez**, and presents this factual basis and stipulation in support of the defendant's plea of guilty to Counts One of the information, and in support thereof, would show the following:

1. That the defendant hereby stipulates and agrees to the truth of all matters set forth in this factual basis and stipulation, and agrees that such admission may be used by the Court in support of his plea of guilty to:
  - Count One of the information, which charges a violation of 21 U.S.C. § 846, conspiracy to possess with the intent to distribute a Schedule II controlled substance, namely more than 500 grams but less than 5 kilograms of cocaine HCL.
2. That the defendant, who is pleading guilty to such information, is one and the same person charged in the information.



3. That the events described in the information occurred in the Eastern District of Texas and elsewhere.
4. That had this matter proceeded to trial, the government, through the testimony of witnesses, including expert witnesses, and through admissible exhibits, would have proven, beyond a reasonable doubt, each and every essential element of the offense alleged in the information; specifically, the government would have proven the following stipulated facts:
  - a. In December 2013, DEA Galveston Resident Office agents established a Cooperating Source ("CS1") who provided information into the drug trafficking activities of Alvaro Romero. CS1 advised that Romero obtained narcotics from a source in the Rio Grande Valley, had them transported to the Houston area, and then distributed them through the Eastern District of Texas to Lake Charles, Louisiana, and other locations further east. He placed the proceeds from the sales of these narcotics into the financial system in order to conceal their nature.
  - b. CS1 advised that before becoming a CS, he/she had purchased approximately two hundred and fifty (250) pounds of marijuana and eight (8) kilograms of cocaine from Romero.
  - c. On January 2014, CS1 made three narcotics purchases from Romero and called Romero's phone to set up the purchases.
  - d. Based on these calls, Title III interceptions began. The phones of the following individuals were intercepted beginning at the following times.

Date Started	Individual(s)' Phone(s)
February 14, 2014	Alvaro Romero
March 5, 2014	Miguel Rodriguez
March 21, 2014	Alvaro Romero, Arturo Elizondo
April 22, 2014	Alvaro Romero, Arturo Elizondo
May 14, 2014	Jose Rubio Villegas
July 2, 2014	Ricardo Aviles
August 8, 2014	Ricardo Aviles

## Exhibit A.2

- e. During the initial round of interception of Romero's phone in February through March 2014, agents learned Romero had Courier 2 and Courier 3 transporting methamphetamine and cocaine HCL from the Rio Grande Valley to the Houston area.

- f. On March 2, 2014, the Kingsville, Texas, Specialized Crime and Narcotics Task Force seized 2.18 kilograms cocaine HCL and 6.54 kilograms methamphetamine (actual) from Courier 2 and Courier 3 following a traffic stop.

- g. In interceptions following the seizure, Romero blamed couriers for Miguel Gerardo Rodriguez for the stop. On March 5, 2014, though a source of information agents learned that **Alexander Alonso Mascarro** was the transportation coordinator for Rodriguez. The source provided **Mascarro's** phone number.

- h. Toll records revealed that on March 2, 2014, before and after the Kingsville, Texas, seizure, **Mascarro** was in phone contact with Courier 2 twelve (12) times. On that date, **Mascarro** was also in phone contact with Courier 3 thirty-four (34) times, and on that date, **Mascarro** was in phone contact with Rodriguez forty-nine (49) times. These phone contacts were for the purpose of arranging delivery of narcotics from the source in the Rio Grande Valley to Rodriguez in the Houston area.

- i. On March 13, 2014, CS1 placed a phone call to **Mascarro** to arrange a purchase of methamphetamine between **Mascarro** and an undercover agent. **Mascarro** was in Guadalajara, Mexico, at the time but agreed to do a sale later. On April 14, 2014, CS1 again spoke with **Mascarro** to arrange the sale of methamphetamine to an undercover agent. On April 17, 2014, **Mascarro** met with the undercover agent and sold the agent 2.06 ounces of methamphetamine actual for \$1,400.

- j. On March 25, 2014, CS1 contacted TFO James Emmerson and said he/she had spoken to Romero, who had told the CS that he was waiting on a 90 kilograms cocaine HCL delivery from the Rio Grande Valley. Romero further told the CS that the 90 kilograms of cocaine HCL would be going straight to Rodriguez. Romero told the CS that he was working on getting a freightliner to transport the 90 kilograms of cocaine HCL from the Rio Grande Valley to Houston, Texas.

- k. On the same day, a Houston Police Department source of information told HPD Detective Patrick McIntyre that Rodriguez and **Mascarro** were in the

Exhibit A3

Exhibit A3  
set up -  
The freight lines  
us at family members  
use. Didn't even run.

Discovery

3  
what evidence  
points to  
re?

process of obtaining a freightliner for transporting this delivery.

1. In June 2014, a source of information informed the Houston Police Department that an older model Chevrolet Silverado with Tamaulipas, Mexico, license plate WL49884 was transporting narcotics from Tamaulipas, Mexico to **Mascarro's** auto shop in Houston. The Houston Police Department forward this information to agents investigating this case.
2. On July 10, 2014, agents noticed the Chevrolet Silverado with the Tamaulipas, Mexico, license plate WL49884 was traveling north on U.S. Highway 77. Agents notified the Kingsville Specialized Crime and Narcotics Task Force who stopped Courier 4. During a search of the vehicle, agents recovered 2.4 kilograms of cocaine HCL. Courier 4 was transporting the cocaine HCL to **Mascarro's** auto shop at **Mascarro's** direction.

n. In the investigation, agents made the following seizures:

Date	Location	Co-conspirator(s)	Contraband
February 25, 2014	Beaumont, TX	Courier 1 Romero Elizondo	0.5 kg cocaine
March 2, 2014	Kingsville, TX	Courier 2 Courier 3 Romero <b>Alexander Alonso Mascarro</b> Rodriguez	2.18 kg cocaine 6.54 kg methamphetamine actual
April 17, 2014	Friendswood, TX	FNU LNU <b>Alexander Alonso Mascarro</b>	2 ounces methamphetamine actual
May 26, 2014	Sarita, TX	Lopez Romero Rodriguez	7.12 kgs methamphetamine actual
June 6, 2014	West Houston, TX	Jose Rubio Villegas Ines Rubio Villegas Aviles Worrell	15 kg cocaine HCL discussed 10 kg seized
June 10, 2014	Houston TX	Jose Rubio Villegas Worrell	(SW of Jose Rubio Villegas's home) 1 assault rifle

# Exhibit A.4

1.0

			2 handguns Body armor Note from Worrell about June 6 event
July 10, 2014	Kingsville, TX	Courier 4 <b>Alexander Alonso Mascarro</b>	2.4 kg cocaine HCL

- o. Through the course of the conspiracy, **Alexander Alonso Mascarro** was personally responsible for distributing and agreeing to distribute 6.59 kilograms of methamphetamine actual and at least 4.58 kilograms of cocaine HCL.

## DEFENDANT'S SIGNATURE AND ACKNOWLEDGMENT

5. I have read this factual basis and stipulation and information or have had them read to me and have discussed them with my attorney. I fully understand the contents of this factual basis and stipulation and agree without reservation that the United States can prove each of these acts and that it accurately describes the events about my acts and the events as recited as I know them.

Dated: \_\_\_\_\_

\_\_\_\_\_  
ALEXANDER ALONSO MASCARRO  
Defendant

## DEFENSE COUNSEL'S SIGNATURE AND ACKNOWLEDGMENT

6. I have read this factual basis and stipulation and the information and have reviewed them with my client, **Alexander Alonso Mascarro**. Based upon my discussions with the defendant, I am satisfied that the defendant understands the factual basis and stipulation as well as the information, and is knowingly and voluntarily agreeing to these stipulated facts.

Exhibit A.5

Dated: \_\_\_\_\_

\_\_\_\_\_  
JOEL W. VAZQUEZ  
Attorney for the Defendant

Respectfully submitted,

JOSEPH D. BROWN  
UNITED STATES ATTORNEY

\_\_\_\_\_  
CHRISTOPHER RAPP  
Assistant United States Attorney  
Eastern District of Texas  
350 Magnolia, Suite 150  
Beaumont, Texas 77701  
(409) 839-2538  
(409) 839-2550 Fax  
Arizona Bar No. 025704

Date: 9/14/2013 08:41 AM  
Estimate ID: 16  
Estimate Version: 0  
Preliminary  
Profile ID: Mitchell

## ALONSO'S FRAME AND BODY SHOP

7719 1/2 PARK PLACE BLVD., HOUSTON, TX 77087  
(713) 855-6265  
Fax: (713) 641-0409  
Email: ALONSOSFRAMEANDBODY@GMAIL.COM

Damage Assessed By: MITCHELL MITCHELL

Arrival Date: 9/12/2013  
Accident Date: 9/11/2013  
Deductible: UNKNOWN

Insured: CLIENTE JAVIER

Mitchell Service: 910647

Description: 2008 Cadillac Escalade

Body Style: 4D Ut

VIN: 1GYEC63818R141050

Drive Train: 6.2L Inj 8 Cyl 2WD

OEM/ALT: O

Search Code: None

Options: PASSENGER AIRBAG, DRIVER AIRBAG, POWER DRIVER SEAT, POWER LOCK, POWER WINDOW  
POWER STEERING, CRUISE CONTROL, TILT STEERING COLUMN, POWER PASSENGER SEAT  
LUGGAGE RACK, PREMIUM SOUND SYSTEM, ANTI-LOCK BRAKE SYS., TRACTION CONTROL  
FOG LIGHTS, ALUM/ALLOY WHEELS, REMOTE IGNITION, ENTERTAINMENT SYSTEM  
HIGH INTENSITY DISCHARGE HEADLIGHTS, SATELLITE RADIO, TOW HITCH RECEIVER  
FRONT AIR DAM, TINTED GLASS, GENUINE WOOD TRIM, AUTO AIR CONDITION  
TRIP COMPUTER, THIRD ROW SPLIT BENCH SEAT, TELEMATIC SYSTEMS  
UNIVERSAL GARAGE DOOR OPENER, THIRD ROW REMOVABLE SEAT, ANTI-THEFT SYSTEM  
AUTOMATIC HEADLIGHTS, INTERIOR AUTOMATIC DAY/NIGHT OR ELECTROCHROMATIC MIRROR  
SIDE HEAD CURTAIN AIRBAGS, VEHICLE THEFT TRACKING/NOTIFICATION  
DAYTIME RUNNING LIGHTS, ADAPTIVE VARIABLE SUSPENSION  
AM/FM STEREO CD CHANGER/MP3 PLAYER, CHROME RUNNING BOARDS  
DRIVER HEATED MEMORY SEAT, ELECTRONIC PARKING AID, ELECTRONIC STABILITY CONTROL  
FRONT HEATED BUCKET SEATS, FRONT SEATS WITH POWER LUMBAR SUPPORT  
KEYLESS ENTRY SYSTEM, LEATHER AND WOOD STEERING WHEEL, POWER DISC BRAKES  
POWER HEATED ELECTROCHROMATIC EXTERIOR MIRRORS, RAIN SENSING WIPERS  
REAR AUDIO CONTROLS, REAR LOCKING DIFFERENTIAL, REAR WINDOW DIVERSITY ANTENNA  
REAR WINDOW WIPER, SECOND ROW FOLDING BUCKET SEATS  
STEERING WHEEL AUDIO CONTROLS

Line Item	Entry Number	Labor Type	Operation	Line Item Description	Part Type/ Part Number	Dollar Amount	Labor Units
1	AUTO	BDY	OVERHAUL	Frnt Bumper Cover Assy			2.7 #
2	003120	BDY	REMOVE/REPLACE	Frnt Bumper Cover	25814554 GM PART	852.47	INC #
3	AUTO	REF	REFINISH	Frnt Bumper Cover			C 2.9
4	003121	BDY	REMOVE/REPLACE	Frnt Bumper Bolt 10@4.12	25705182 GM PART	41.20	INC
5	000017	BDY	REMOVE/REPLACE	Frnt Bumper Air Deflector	15138234 GM PART	58.69	INC
6	000022	BDY	REMOVE/REPLACE	Frnt Bumper License Plate Bracket	15941065 GM PART	120.05	INC
7	AUTO	REF	REFINISH	Frnt License Base			C 0.4
8	002136	BDY	REMOVE/REPLACE	R Frnt Bumper Tow Hook Cover	15893973 GM PART	33.00	INC
9	002137	BDY	REMOVE/REPLACE	L Frnt Bumper Tow Hook Cover	15893972 GM PART	32.33	INC
10	000018	BDY	REMOVE/REPLACE	Frnt Bumper Cover Support	15882456 GM PART	107.14	INC #
11	AUTO	BDY	REMOVE/INSTALL	Frnt Bumper Cover			INC #
12	000019	BDY	REMOVE/REPLACE	Frnt Bumper Impact Bar	25947497 GM PART	363.11	0.4 #
13	000020	BDY	REMOVE/REPLACE	Frnt Bumper Bracket	22742861 GM PART	42.76	0.3 #
14	000092	BDY	REMOVE/REPLACE	Grille	20824256 GM PART	573.92	INC #

ESTIMATE RECALL NUMBER: 09/14/2013 08:41:06 16

Mitchell Data Version: OEM: JAN\_12\_V

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Software Version: 7.0.438

Page 1 of 2

Date: 9/14/2013 08:41 AM  
 Estimate ID: 16  
 Estimate Version: 0  
 Preliminary  
 Profile ID: Mitchell

15	AUTO	BDY	REMOVE/INSTALL	R Frt Combination Lamp					INC #
16	AUTO	BDY	REMOVE/INSTALL	L Frt Combination Lamp					INC #
17	000023	BDY	REMOVE/REPLACE	Upr Grille Bracket	15904442	GM PART	60.94		INC #
18	000124	BDY	REMOVE/REPLACE	R Front Combination Lamp Assembly	25897649	GM PART	872.63		INC #
19	AUTO	BDY	CHECK/ADJUST	Headlamps				0.4	
20	000125	BDY	REMOVE/REPLACE	L Front Combination Lamp Assembly	25897648	GM PART	905.59		INC #
21	002453	BDY	REMOVE/REPLACE	Cooling Radiator Support	20805487	GM PART	631.27	6.3 #	
22	AUTO	MCH	REMOVE/REPLACE	Add To R&R Mechanical Components				0.9 #	
23	AUTO	MCH	REMOVE/REPLACE	Evacuate & Recharge A/C				1.4	
24	000315	BDY	REMOVE/REPLACE	R Fender Panel	25819549	GM PART	494.32	3.3 #	
25	AUTO	REF	REFINISH	R Fender Outside				C 2.0	
26	AUTO	REF	REFINISH	R Fender Edge & Inside				C 1.2	
27	000484	MCH	REMOVE/REPLACE	R Lwr Frt Susp Control Arm Assy		ORDER FROM DEALER	278.32	2.2 #	
28	000493	MCH	REMOVE/REPLACE	R Frt Susp Strut		ORDER FROM DEALER	149.84	1.8 #	
29	AUTO	REF	ADD'L OPR	Clear Coat				1.9	

# - Labor Note Applies  
 C - Included in Clear Coat Calc

## Estimate Totals

I. Labor Subtotals						II. Part Replacement Summary				Amount
	Units	Rate	Add'l Labor Amount	Sublet Amount	Totals					
Body	13.4	48.00	0.00	0.00	643.20	T	Taxable Parts		5,617.58	
Refinish	8.4	48.00	0.00	0.00	403.20	T	Sales Tax	@ 8.250%	463.45	
Mechanical	6.3	65.00	0.00	0.00	409.50	T				
Taxable Labor					1,455.90		Total Replacement Parts Amount		6,081.03	
Labor Summary	28.1				1,455.90					
III. Additional Costs					Amount	IV. Adjustments				Amount
Total Additional Costs					0.00	Customer Responsibility				0.00

# Allstate Fire and Casualty Ins. Co.

LONE STAR AUTO MCO

Supplement Request Fax Line:

866-464-1109

4920 Westway Park Blvd., Ste 220

Houston, TX 77041

Claim #:  
Workfile ID:

000299456987D01  
0f3843d6

## Estimate of Record

Written By: ROBIN BOYER, License Number: 284372, 9/18/2013 1:34:41 PM  
Adjuster: ROBERT MCMILLAN, (806) 788-3801 Day

Insured: MARIA SENDEJO Policy #: 000916552743 Claim #: 000299456987D01  
Type of Loss: Collision Date of Loss: 09/11/2013 12:00 PM Days to Repair: 8  
Point of Impact: 12 Front Deductible: 1000.00

<b>Owner:</b> MARIA SENDEJO 618 SHAWNEE ST HOUSTON, TX 77034-1335 (832) 620-2959 Other	<b>Inspection Location:</b> ALONZO'S FRAME AND BODY 7719 1/2 PARK PLACE BLVD HOUSTON, TX 77087 Repair Facility (713) 855-6265 Day	<b>Appraiser Information:</b> chfjs@allstate.com (713) 515-8976	<b>Repair Facility:</b> ALONZO'S FRAME AND BODY 7719 1/2 PARK PLACE BLVD HOUSTON, TX 77087 (713) 855-6265 Day
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## VEHICLE

Year: 2008	Color: BLUE	Int: Int	License: CP9 H394	Production Date: 09/2007
Make: CADI	Body Style: 4D UTV		State: TX	Odometer: 117190
Model: ESCALADE 4X2	Engine: 8-6.2L-FI		VIN: 1GYEC63818R141050	Condition:

### TRANSMISSION

Automatic Transmission  
Overdrive

### POWER

Power Steering  
Power Brakes  
Power Windows  
Power Locks  
Power Mirrors  
Heated Mirrors  
Power Driver Seat  
Power Passenger Seat  
Power Adjustable Pedals

### DECOR

Dual Mirrors  
Body Side Moldings  
Privacy Glass  
Console/Storage  
Overhead Console

### CONVENIENCE

Air Conditioning  
Intermittent Wipers  
Tilt Wheel  
Cruise Control  
Rear Defogger  
Message Center  
Steering Wheel Touch Controls  
Rear Window Wiper  
Climate Control  
Dual Air Condition  
Navigation System  
Backup Camera  
Entertainment Center  
Remote Starter  
Home Link

### RADIO

AM Radio  
FM Radio  
Stereo  
Search/Seek

CD Player  
Premium Radio  
Satellite Radio  
CD Changer/Stacker  
**SAFETY**  
Drivers Side Air Bag  
Passenger Air Bag  
Anti-Lock Brakes (4)  
4 Wheel Disc Brakes  
Traction Control  
Stability Control  
Front Side Impact Air Bags  
Head/Curtain Air Bags  
Rear Side Impact Air Bags  
Communications System  
Xenon Headlamps  
Positraction  
**ROOF**  
Luggage/Roof Rack  
Electric Glass Sunroof

### SEATS

Leather Seats  
Heated Seats  
Rear Heated Seats  
Ventilated Seats  
Power Third Seat  
Captain Chairs (4)

### WHEELS

20" Or Larger Wheels

### PAINT

Clear Coat Paint  
Metallic Paint

### OTHER

Fog Lamps  
Signal Integrated Mirrors

### TRUCK

Trailer Hitch  
Trailer Package  
Running Boards/Side Steps  
Power Trunk/Gate Release



### Estimate of Record

2008 CADi ESCALADE 4X2 4D UTV 8-6.2L-FI BLUE

Line	Oper	Description	Part Number	Qty	Extended Price \$	Labor	Paint
1		<b>FRONT BUMPER</b>					
2		O/H front bumper		0	0.00	2.7	0.0
3	** <>	Repl A/M CAPA Bumper cover	GM1000816PP	1	451.00	Incl.	2.8
4		Add for Clear Coat		0	0.00	0.0	1.1
5		Add for fog lamps		0	0.00	0.3	0.0
6	**	Repl A/M Center bracket	GM1065107	1	34.00	Incl.	0.0
7		Repl Center support	15882456	1	123.67	Incl.	0.0
8	**	Repl Opt OEM Impact bar 1st design	15854109	1	182.59	Incl.	0.0
9	**	Repl A/M LT Outer filler	GM1088176	1	41.00	Incl.	0.0
10		Repl LT Tow brkt cover	15893972	1	36.07	Incl.	0.0
11	**	Repl A/M Air deflector	GM1092222	1	50.00	Incl.	0.0
12		Repl License bracket	15140153	1	45.90	Incl.	0.0
13		Repl LT Bumper cover side bracket	25948814	1	22.15	Incl.	0.0
14		<b>GRILLE</b>					
15		R&I Grille assy blue code: 25U		0	0.00	Incl.	0.0
16	*	Rpr Grille assy blue code: 25U		0	0.00	0.0	1.6
17		Overlap Major Non-Adj. Panel		0	0.00	0.0	-0.2
18		Add for Clear Coat		0	0.00	0.0	0.3
19	*	R&I Emblem		0	0.00	Incl.	0.0
20	**	Repl A/M Mount panel	GM1207108	1	40.00	Incl.	0.0
21		<b>FRONT LAMPS</b>					
22	**	Repl Opt OEM RT Headlamp assy	25897649	1	730.97	Incl.	0.0
23		Aim headlamps		0	0.00	0.5	0.0
24	**	Repl Opt OEM LT Headlamp assy	25897648	1	766.09	Incl.	0.0
25	**	Repl A/M CAPA LT Fog lamp assy	GM2592163C	1	176.00	Incl.	0.0
26		Repl LT Support	15874642	1	18.92	0.0	0.0
27		<b>RADIATOR SUPPORT</b>					
28	*	Repl RCY Radiator support +25%	20805487	1	<u>562.50</u>	<u>6.0</u>	0.0
		NOTE: PARTS UNLIMITED (281)489-0990					
29		Evacuate & recharge		0	0.00 m	1.4 M	0.0
30		Add for trans cooler		0	0.00 m	0.3	0.0
31		<b>FENDER</b>					
32	*	Rpr LT Fender Escalade		0	0.00	<u>3.5</u>	2.0
33		Overlap Major Non-Adj. Panel		0	0.00	0.0	-0.2
34		Add for Clear Coat		0	0.00	0.0	0.4
35		R&I LT Fender liner Escalade base & luxury		0	0.00	0.3	0.0
36		R&I LT Grille w/Escalade chrome		0	0.00	0.3	0.0
37	#	Rpr Floor set up		0	0.00	0.5	0.0
38	#	BODY PULLS		1	0.00	1.5	0.0
39		<b>TIRES</b>					
40	*	Repl BDGST P285/45R22 DUELER H/L	BR00189	1	258.99	0.3	0.0

**Estimate of Record**

2008 CADi ESCALADE 4X2 4D UTV 8-6.2L-FI BLUE

ALENZA BW 110H

41	<b>ELECTRICAL</b>						
42		Repl	Low note horn	89046918	1	70.50	0.2 0.0
43	<b>INSTRUMENT PANEL</b>						
44	*	Repl	Upper trim panel ebony -10%	20844035	1	<u>254.07</u>	0.8 0.0
45	<b>PILLARS, ROCKER &amp; FLOOR</b>						
46		R&I	LT Running board		0	0.00	1.0 0.0
47	**	Repl	A/M Flex Additive		1	4.35	0.0 0.0
48	**	Repl	A/M Antifreeze - Other - per Gal - ext life		1	15.00	0.0 0.0
49	**	Repl	A/M Window Washer Fluid		1	1.50	0.0 0.0
50	<b>OTHER CHARGES</b>						
51	#		Towing		1	160.50	
52	#		E.P.C.		1	2.50	
<b>SUBTOTALS</b>						<b>4,048.27</b>	<b>19.6 7.8</b>

**ESTIMATE TOTALS**

Category	Basis	Rate	Cost \$
Parts			3,885.27
Body Labor	18.2 hrs @	\$ 42.00 /hr	764.40
Paint Labor	7.8 hrs @	\$ 42.00 /hr	327.60
Mechanical Labor	1.4 hrs @	\$ 70.00 /hr	98.00
Paint Supplies	7.8 hrs @	\$ 28.00 /hr	218.40
Other Charges			163.00
Subtotal			5,456.67
Sales Tax	\$ 4,103.67 @	8.2500 %	338.55
<b>Total Cost of Repairs</b>			<b>5,795.22</b>
Deductible			1,000.00
Deductible Credit			-400.00
<b>Total Adjustments</b>			<b>600.00</b>
<b>Net Cost of Repairs</b>			<b>5,195.22</b>

Deductible Reduction Credit: Your policy includes a deductible reduction feature that has been applied to reduce the Collision deductible applicable to this loss.

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**SUPPLEMENT REQUEST PROCESS INSTRUCTIONS:**

Fax Supplement Request Form with Required Information

Supplement Request Fax Line: 866-464-1109

## Estimate of Record

2008 CADI ESCALADE 4X2 4D UTV 8-6.2L-FI BLUE

Supplement Status Line: 877-599-7759

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Estimate based on MOTOR CRASH ESTIMATING GUIDE. Unless otherwise noted all items are derived from the Guide DR1GC07, CCC Data Date 8/1/2013, and the parts selected are OEM-parts manufactured by the vehicles Original Equipment Manufacturer. OEM parts are available at OE/Vehicle dealerships. OPT OEM (Optional OEM) or ALT OEM (Alternative OEM) parts are OEM parts that may be provided by or through alternate sources other than the OEM vehicle dealerships. OPT OEM or ALT OEM parts may reflect some specific, special, or unique pricing or discount. OPT OEM or ALT OEM parts may include "Blemished" parts provided by OEM's through OEM vehicle dealerships. Asterisk (\*) or Double Asterisk (\*\*) indicates that the parts and/or labor information provided by MOTOR may have been modified or may have come from an alternate data source. Tilde sign (~) items indicate MOTOR Not-Included Labor operations. The symbol (<>) indicates the refinish operation WILL NOT be performed as a separate procedure from the other panels in the estimate. Non-Original Equipment Manufacturer aftermarket parts are described as Non OEM or A/M. Used parts are described as LKQ, RCY, or USED. Reconditioned parts are described as Recond. Recored parts are described as Recore. NAGS Part Numbers and Benchmark Prices are provided by National Auto Glass Specifications. Labor operation times listed on the line with the NAGS information are MOTOR suggested labor operation times. NAGS labor operation times are not included. Pound sign (#) items indicate manual entries.

Some 2014 vehicles contain minor changes from the previous year. For those vehicles, prior to receiving updated data from the vehicle manufacturer, labor and parts data from the previous year may be used. The CCC ONE estimator has a complete list of applicable vehicles. Parts numbers and prices should be confirmed with the local dealership.

The following is a list of additional abbreviations or symbols that may be used to describe work to be done or parts to be repaired or replaced:

### SYMBOLS FOLLOWING PART PRICE:

m=MOTOR Mechanical component. s=MOTOR Structural component. T=Miscellaneous Taxed charge category.  
X=Miscellaneous Non-Taxed charge category.

### SYMBOLS FOLLOWING LABOR:

D=Diagnostic labor category. E=Electrical labor category. F=Frame labor category. G=Glass labor category.  
M=Mechanical labor category. S=Structural labor category. (numbers) 1 through 4=User Defined Labor Categories.

### OTHER SYMBOLS AND ABBREVIATIONS:

Adj.=Adjacent. Algn.=Align. ALU=Aluminum. A/M=Aftermarket part. Blnd=Blend. BOR=Boron steel.  
CAPA=Certified Automotive Parts Association. D&R=Disconnect and Reconnect. HSS=High Strength Steel.  
HYD=Hydroformed Steel. Incl.=Included. LKQ=Like Kind and Quality. LT=Left. MAG=Magnesium. Non-Adj.=Non  
Adjacent. NSF=NSF International Certified Part. O/H=Overhaul. Qty=Quantity. Refn=Refinish. Repl=Replace.  
R&I=Remove and Install. R&R=Remove and Replace. Rpr=Repair. RT=Right. SAS=Sandwiched Steel.  
Sect=Section. Subl=Sublet. UHS=Ultra High Strength Steel. N=Note(s) associated with the estimate line.

## Estimate of Record

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2008 CADI ESCALADE 4X2 4D UTV 8-6.2L-FI BLUE

CCC ONE Estimating - A product of CCC Information Services Inc.

The following is a list of abbreviations that may be used in CCC ONE Estimating that are not part of the MOTOR CRASH ESTIMATING GUIDE:

BAR=Bureau of Automotive Repair. EPA=Environmental Protection Agency. NHTSA= National Highway Transportation and Safety Administration. PDR=Paintless Dent Repair. VIN=Vehicle Identification Number.

### IMPORTANT INFORMATION ABOUT THE NAMED INSURANCE COMPANY'S CHOICE OF PARTS POLICY.

THIS ESTIMATE MAY LIST PARTS FOR USE IN THE REPAIR OF YOUR VEHICLE THAT ARE MANUFACTURED BY A COMPANY OTHER THAN THE ORIGINAL MANUFACTURER OF YOUR VEHICLE. THESE PARTS ARE COMMONLY REFERRED TO AS AFTERMARKET PARTS OR COMPETITIVE PARTS, AND MAY INCLUDE COSMETIC OUTER BODY CRASH PARTS SUCH AS HOODS, FENDERS, BUMPER COVERS, ETC. THE INSURANCE COMPANY GUARANTEES THE FIT AND CORROSION RESISTANCE OF ANY AFTERMARKET/COMPETITIVE OUTER BODY CRASH PARTS THAT ARE LISTED ON THIS ESTIMATE AND ACTUALLY USED IN THE REPAIR OF YOUR VEHICLE FOR AS LONG AS YOU OWN IT. IF A PROBLEM DEVELOPS WITH THE FIT OR CORROSION RESISTANCE OF THESE PARTS, THEY WILL BE REPAIRED OR REPLACED AT THE INSURANCE COMPANY'S EXPENSE. THIS GUARANTEE IS LIMITED TO THE REPAIR OR REPLACEMENT OF THE PART. HOWEVER, IF YOU CHOOSE NOT TO USE ONE OR MORE OF THE AFTERMARKET/COMPETITIVE OUTER BODY CRASH PARTS THAT MAY BE LISTED ON THIS ESTIMATE IN THE REPAIR OF YOUR VEHICLE, THE INSURANCE COMPANY WILL SPECIFY THE USE OF ORIGINAL EQUIPMENT MANUFACTURER PARTS, EITHER NEW OR RECYCLED AT THE INSURANCE COMPANY'S OPTION, AT NO ADDITIONAL COST TO YOU. THE INSURANCE COMPANY DOES NOT SEPARATELY GUARANTEE THE PERFORMANCE OF ORIGINAL EQUIPMENT MANUFACTURER PARTS, AND MAKES NO REPRESENTATION ABOUT THE AVAILABILITY OF ANY MANUFACTURER'S GUARANTEE.

**Estimate of Record**

2008 CADI ESCALADE 4X2 4D UTV 8-6.2L-FI BLUE

**ALTERNATE PARTS SUPPLIERS**

Line	Description	Supplier	Item #	Price
3	A/M CAPA Bumper cover Quote #3414944  Expires 11/01/13	Keystone - HOUSTON, TX 19423 ALDINE WESTFIELD RD, HOUSTON TX 77073	GM1000816PP (281) 444-5559	\$ 451.00
6	A/M Center bracket	NationalAutobodyPartsFPPP-UPS Whitesel, Reid 2000 E. MAIN, GRAND PAIRIE TX 75050	GM1065107 (800) 214-7222	\$ 34.00
8	Opt OEM Impact bar 1st design	RYDELL CHEVROLET PARTS, PARTS 1324 E SAN MARNAN DR, WATERLOO IA 50702	15854109 (888) 462-1197	\$ 182.59
9	A/M LT Outer filler	UCC-National Auto Parts-HOUSTO Ho, Eugene 6601 Polk St, Houston TX 77011	GM1088176 (713) 926-6788	\$ 41.00
11	A/M Air deflector Quote #3414944  Expires 11/01/13	Keystone - HOUSTON, TX 19423 ALDINE WESTFIELD RD, HOUSTON TX 77073	GM1092222 (281) 444-5559	\$ 50.00
20	A/M Mount panel	UCC-National Auto Parts-HOUSTO Ho, Eugene 6601 Polk St, Houston TX 77011	GM1207108 (713) 926-6788	\$ 40.00
22	Opt OEM RT Headlamp assy	RYDELL CHEVROLET PARTS, PARTS 1324 E SAN MARNAN DR, WATERLOO IA 50702	25897649 (888) 462-1197	\$ 730.97
24	Opt OEM LT Headlamp assy	RYDELL CHEVROLET PARTS, PARTS 1324 E SAN MARNAN DR, WATERLOO IA 50702	25897648 (888) 462-1197	\$ 766.09
25	A/M CAPA LT Fog lamp assy	National Autobody Parts - UPS Whitesel, Reid 2000 E. MAIN, GRAND PRAIRIE TX 75050	GM2592163C (800) 214-7222	\$ 176.00

**Estimate of Record**

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2008 CADI ESCALADE 4X2 4D UTV 8-6.2L-FI BLUE

**TIRE PARTS SUPPLIERS**

Line	Description	Supplier	Price
40	BDGST P285/45R22 DUELER H/L ALENZA BW 110H	NTB 10950 GULF FREEWAY, HOUSTON TX 77034-0	\$ 258.99
		(713) 941-0320	